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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF FILING OF THIRD
SUPPLEMENT TO PLAN SUPPLEMENT
IN CONNECTION WITH DEBTORS' AND
SHAREHOLDER PROPONENTS' JOINT
CHAPTER 11 PLAN OF
REORGANIZATION**

[Relates to Dkt. No. 7037, 7503, 7563]

1 **PLEASE TAKE NOTICE** that, on September 9, 2019, PG&E Corporation (“**PG&E Corp.**”)
2 and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively,
3 the “**Debtors**”) in the above-captioned chapter 11 cases, filed the *Debtors’ Joint Chapter 11 Plan of*
Reorganization [Dkt. No. 3841], which was thereafter amended, modified, or supplemented on
September 23, 2019 and November 4, 2019 [Dkt. Nos. 3966 and 4563, respectively].

4 **PLEASE TAKE FURTHER NOTICE** that, on December 12, 2019, the Debtors filed the
5 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated December 12,*
6 *2019* [Dkt. No. 5101], which was thereafter amended, modified, or supplemented on January 31, 2020,
7 February 7, 2020, March 9, 2020, March 16, 2020, and May 22, 2020 [Dkt. Nos. 5590, 5700, 6217,
6320, and 7521 respectively] (and as may be further amended, modified, or supplemented and together
with all exhibits and schedules thereto, the “**Plan**”).

8 **PLEASE TAKE FURTHER NOTICE** that, on May 1, 2020, the Debtors filed the *Notice of*
9 *Filing of Plan Supplement in Connection with Debtors’ and Shareholder Proponents’ Joint Chapter 11*
10 *Plan of Reorganization Dated March 16, 2020* [Dkt. No. 7037] (as supplemented on May 22, 2020 [Dkt.
11 No. 7503] and May 24, 2020 [Dkt. No. 7563] and as may be further amended, modified, or
supplemented, the “**Plan Supplement**”).

12 **PLEASE TAKE FURTHER NOTICE** that, on June 2, 2020, the Debtors filed the *Stipulation*
13 *Addressing Certain Plan Confirmation Objections of the Official Tort Claimants Committee* [Dkt. No.
14 7711] (the “**Stipulation**”), entered into by and between the Debtors, the Shareholder Proponents, and
the TCC (all as defined therein). Pursuant to the Stipulation, the Debtors file this Third Supplement to
the Plan Supplement.

15 **This Third Supplement to the Plan Supplement contains the following amended document:**

- 16 • Exhibit A – Schedule of Assigned Rights and Causes of Action

17 **PLEASE TAKE FURTHER NOTICE** that the Schedule of Assigned Rights and Causes of
18 Action has been amended from the prior version filed to, among other things, revise the description of
19 the rights, claims, causes of action, and defenses to be assigned to the Fire Victim Trust pursuant to the
terms of the Plan.

20 **PLEASE TAKE FURTHER NOTICE** that the Plan Supplement documents attached hereto
21 remain subject to (i) further review, negotiations, and modifications, and (ii) final documentation in a
22 manner consistent with the Plan, the Subrogation Claims RSA, the Tort Claimants RSA, the Noteholder
RSA, the Backstop Commitment Letters, and the other Plan Documents, as applicable.

23 **PLEASE TAKE FURTHER NOTICE** that the Debtors and Shareholder Proponents reserve
24 the right to amend the documents contained in the Plan Supplement before the Effective Date in
25 accordance with the terms of the Plan, the Subrogation Claims RSA, the Tort Claimants RSA, the
Noteholder RSA, the Backstop Commitment Letters, and the other Plan Documents, as applicable.

26 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
27 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
28 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate
Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime Clerk LLC,
at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based

parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

Dated: June 2, 2020

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/s/ Thomas B. Rupp
Thomas B. Rupp

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